

July 18, 2002

Federal Communications Commission
Allocations Branch
Room 2 A320
% Office of Secretary
TW B 204
FCC
445 12th Street SW
Washington, D. C. 20554

Dear Sirs;

Jerry E. White, Cindy Mitchell White, Donald E. White and Donald F. White D/B/A Mitchell County Television, a Georgia general partnership have enclosed a Petition for Rulemaking to be filed with the Federal Communications Commission. Mitchell County Television holds a construction permit for WQLI(FM) and is requesting to change the city of license from Pelham, Georgia to Meigs, Georgia.

Upon assignment, Mitchell County Television will promptly apply to modify our construction permit and upon grant will promptly construct its station.

I have prepared and reviewed the enclosed Petition and the statements contained therein are accurate to the best of my knowledge.

Respectfully Submitted;

A large, stylized handwritten signature in black ink, appearing to read "Jerry E. White".

Jerry E. White
Managing Partner
Mitchell County Television
2586 Old Pelham Road
Pelham, Georgia 31779
229-294-1909

No. of Copies rec'd
List ABCDE

014
MB


02-173

Affidavit

State of Georgia)
) ss:
Mitchell County)

Jerry E. White being first duly sworn, deposes and says that he has prepared the attached Petition for Rulemaking and that he has also reviewed the petition.

That all of the statements contained in the petition are accurate the best of his knowledge and belief.


Jerry E. White
Affiant

Subscribed and sworn to before me this 18th day of July, 2002

Cindy Mitchell White
Cindy Mitchell White
Notary Public
My Commission Expires May 21, 2004

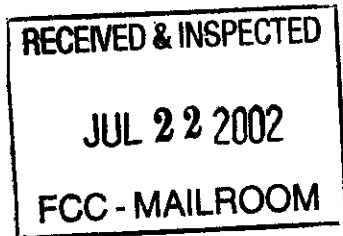
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Before The
Federal Communications Commission
Washington, DC 20554

In the Matter of

Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Stations
Pelham, Georgia and Meigs,
Georgia

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}
}
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}
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To: Chief, Allocations Branch

Petition for Rulemaking

Jerry E. White, Cindy Mitchell White, Donald E. White and Donald F. White, D/B/A Mitchell County Television, hereby request the Commission to institute a rulemaking proceeding to amend Section 73.202(b) of the Commission's rules, the Table of FM Allotments, by deleting Channel 222A from Pelham, Georgia and allotting Channel 222A to Meigs, Georgia as the community's first local aural service. In support thereof, the following is stated:

Mitchell County Television, a Georgia General Partnership, is the permittee of WQLI (FM). WQLI's community of license is Pelham, Georgia. WQLI is presently unconstructed and is not providing service. Mitchell County Television seeks to change WQLI's community of license from Pelham, Georgia to Meigs, Georgia.

Meigs is an incorporated community with a population of 1,090 persons, according to the 2000 census. It has a mayor and council, its own police force and supports a post office with its own zip code 31765. Meigs is less than 10 minutes driving time from Pelham by Georgia Highway 3 and Four Lane U.S. Highway 19. Pelham is a local phone call from Meigs. WQLI allotted to Meigs can still easily serve Pelham with coverage of local news and information.

Pelham does have a broadcast allotment as Full Service TV channel 14 is currently operating in Pelham to offer a possibility of local news and information. Also any potential transmitter location for WQLI allotted to Meigs will place a primary (60dBu) signal over the entire city of Pelham.

Attached hereto are engineering exhibits A and B to demonstrate the proposal with the technical standards for allocating a new channel. Reference coordinates are those in WQLI's current Construction Permit. Exhibit A shows that the referenced coordinates meet Commission spacing requirements. Exhibit B is a map of WQLI's Contour showing that Meigs is located within the city grade signal.

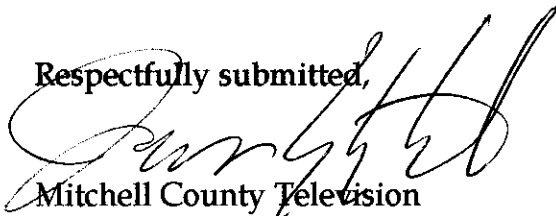
Mitchell County Television believes the public interest would be served by allotting channel 222A to Meigs, Georgia as it's first local aural service.

If the Commission amends the FM Table of Allotments as requested herein, Mitchell County Television will promptly file an application to modify the permit of WQLI for channel 222A in Meigs, Georgia and will promptly construct those facilities.

Mitchell County Television respectfully requests that the Commission institute a rulemaking proceeding that would amend the FM Table of Allotments as follows:

<u>CITY</u>	<u>PRESENT ALLOTMENT</u>	<u>PROPOSED ALLOTMENT</u>
Pelham, GA	222A	-----
Meigs, GA	-----	222A

Respectfully submitted,



Mitchell County Television

Jerry E. White
Managing Partner

Exhibit A Channel 222A Spacing Study
 Mitchell County Television
 Petition for Rulemaking
 July 18, 2002

REFERENCE
 31 04 50 N
 84 09 33 W

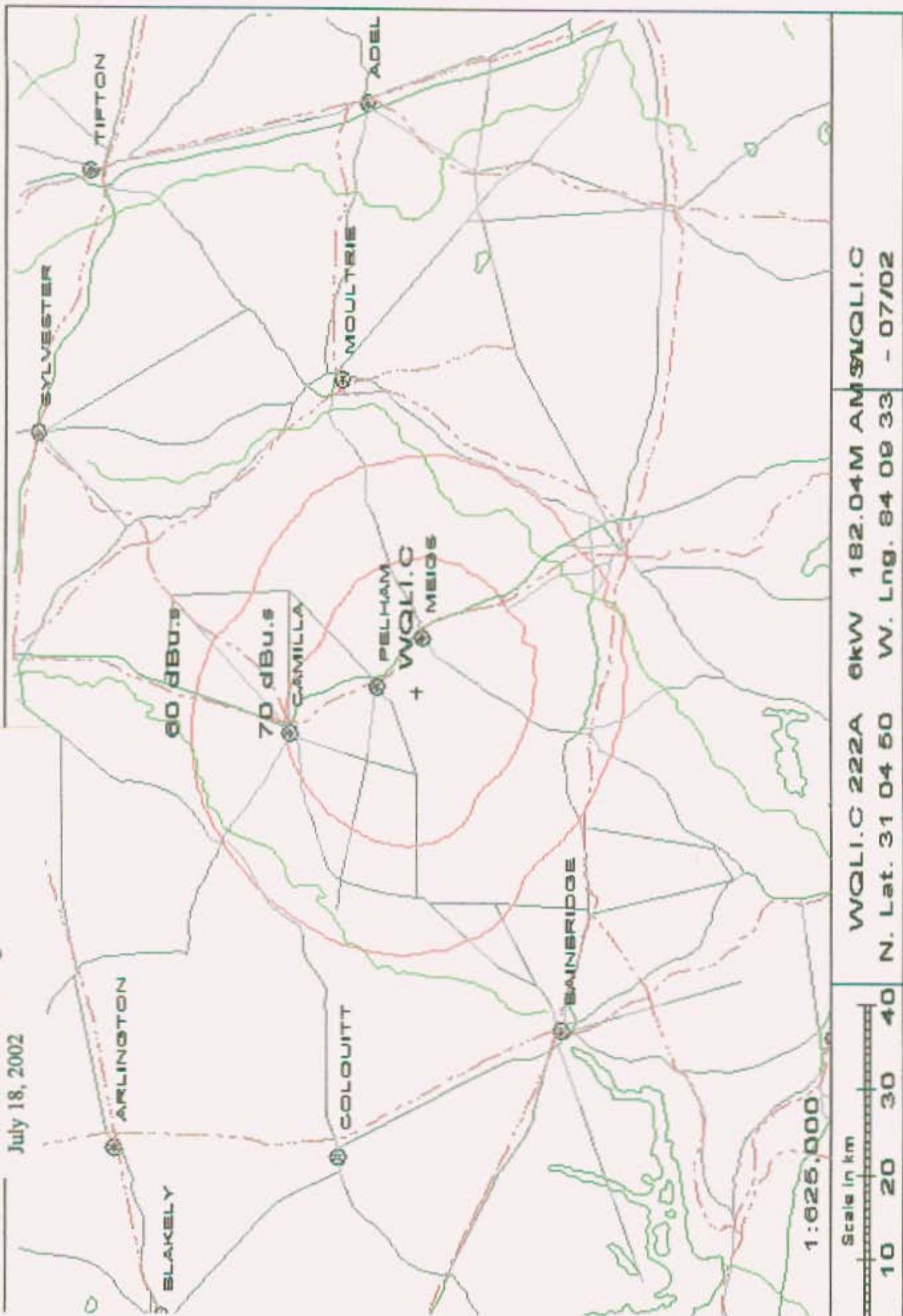
CLASS = A
 Current Spacings
 Channel 222 - 92.3 MHz

DISPLAY DATES
 DATA 05-30-02
 SEARCH 07-15-02

Call	Channel	Location		Dist	Azi	FCC	Margin
WQLI.C	CP 222A	Pelham	GA	0.00	0.0	115.0	-115.00
ALLO	USE 222A	Pelham	GA	2.70	28.6	115.0	-112.30
ALLO	USE 223C1	Panama City	FL	127.69	231.9	133.0	-5.31
ALLO	USE 221A	Adel	GA	73.20	84.8	72.0	1.20
WDDQ	LIC 221A	Adel	GA	73.20	84.8	72.0	1.20
ALLO	USE 223C3	Tifton	GA	91.42	57.6	89.0	2.42
WKZZ	LIC 223C3	Tifton	GA	92.93	57.4	89.0	3.93
ALLO	USE 225C1	Valdosta	GA	82.71	111.7	75.0	7.71
WAAC	LIC 225C1	Valdosta	GA	82.71	111.7	75.0	7.71
WPAPFM	CP 223C1	Panama City	FL	141.96	243.9	133.0	8.96
WPAPFM	LIC 223C1	Panama City	FL	142.15	243.9	133.0	9.15
ALLO	USE 221A	Columbia	AL	87.84	285.1	72.0	15.84
WLWIFM	LIC 222C	Montgomery	AL	242.44	307.9	226.0	16.44
ALLO	USE 222C	Montgomery	AL	242.52	307.9	226.0	16.52



Exhibit B WQLI(FM) Proposed Contours
 Mitchell County Television
 Petition of Rulemaking
 July 18, 2002



Scale in km	10	20	30	40
1:625,000				
WQLI.C 222A	6kW	182.04M	AM	WQLI.C
N. Lat. 31 04 50	W. Long. 84 08 33			- 07/02

Affidavit

State of Georgia

)

) SS:

Mitchell County

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Jerry E. White being first duly sworn, deposes and says that he has knowledge of the Commission's rules and regulations and has prepared other engineering data for various petitions and applications filed with the Commission.

That the engineering date in Exhibits A and B of this petition was prepared by him and all materials and exhibits attached hereto are believed to be true and correct.


Jerry E. White

Jerry E. White
Affiant

Subscribed and sworn to before me this 18th day of July, 2002

 *Cindy Mitchell White*
Cindy Mitchell White
Notary Public
My Commission Expires May 21, 2004

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